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Timothy R. Volpert (OSB 814074)
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2111 NE Hancock St. Ste. 2B
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Phone: 503-703-9054

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,)
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)
Case No. 6:21-cv-00474-AA

**DECLARATION OF AVERY
BONESTROO**

I, Avery Bonestroo, declare:

1. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
2. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
3. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
4. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Avery Bonestroo
Avery Bonestroo

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FOR THE DISTRICT OF OREGON
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Elizabeth HUNTER; et al., on behalf of
themselves and all others similarly situated,)
Plaintiffs,)
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF HAYDEN
BROWN**

I, Hayden Brown, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Hayden Brown

Hayden Brown

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,) Case No. 6:21-cv-00474-AA
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.) **DECLARATION OF BROOK C**

I, Brook C, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Brook C
Brook C

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF TRISTAN CAMPBELL
U.S. DEPARTMENT OF EDUCATION and Suzanne GOLDBERG, in her official capacity as Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Tristan Campbell, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Tristan Campbell

Tristan Campbell

**Paul Carlos Southwick (OSB 095141)
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FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,)
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF SAREN
CRAIG**

I, Saren Craig, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Saren Craig

Saren Craig

**Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
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v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)

Case No. 6:21-cv-00474-AA

DECLARATION OF ALEX DURON

I, Alex Duron, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. My religious beliefs call on me to protect LGBTQ+ students at my college/almu mater from abuse, violence, and oppression.
4. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Alex Duron
Alex Duron

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S
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,)
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)
Case No. 6:21-cv-00474-AA
**DECLARATION OF
MORTIMER HALLIGAN**

I, Mortimer Halligan, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Mortimer Halligan

Mortimer Halligan

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
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Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,) Case No. 6:21-cv-00474-AA
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)
)
**DECLARATION OF RACHEL
HELD**

I, Rachel Held, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Rachel Held

Rachel Held

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**IN THE UNITED STATES DISTRICT COURT
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EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of
themselves and all others similarly situated,)
Plaintiffs,)
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)
Case No. 6:21-cv-00474-AA
**DECLARATION OF LAUREN
HOEKSTRA**

I, Lauren Hoekstra, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Lauren Hoekstra

Lauren Hoekstra

Paul Carlos Southwick (OSB 095141)
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FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF JAMIE
)	LORD
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Jamie Lord, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/ alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/ alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Jamie Lord

Jamie Lord